

Livestock Management

The EIS should evaluate and disclose historic rangeland conditions on a broad, landscape scale and identify avenues to incorporate flexibility in grazing plans and allotments that permit both BLM managers and public-lands ranchers to account for special circumstances such as drought and reduce grazing use when necessary.

43 CFR 4110.3-3, "When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use."

The EIS should evaluate whether riparian protection, habitat conservation for ESA-listed species and habitat management plans for sensitive species are being implemented as committed to in the MP and other planning and/or decision documents. More specifically, the EIS should evaluate ecological restoration needs and develop strategies to achieve restoration goals. It should also consider including roadless and wilderness designations as part of the overall restoration strategy.

The DEIS should examine the tradeoffs associated with various management options for livestock grazing regarding wildlife habitat. This information should be considered when developing the MP or other NEPA decisions. It should include information and guidance which informs BLM managers and other stakeholders about the effects of livestock forage removal and competition with native wildlife. The DEIS should evaluate the extent and risks associated with continued grazing on listed, threatened, endangered or sensitive species and on rare and sensitive species and ecosystems found on BLM lands.

The DEIS should consider an appropriate range of alternatives to achieve multiple-use goals for lands that are desired for other economic and human uses. For example, the EIS should consider a No Grazing Alternative on allotments to evaluate the social, economic, and environmental impacts that may occur if grazing ceases on a given allotment or other land holdings that are desirable for other uses or that are seriously degraded.

The DEIS should consider all impacts in the decision criteria, including land health, riparian protection, wildlife habitat and recreation, with equal consideration to grazing. The decision criteria should be based on sound science and economics rather than solely on sustaining a single-use objective.



Noxious weeds

The short and long-term impact of noxious weeds on public lands is affecting both the quality of native habitat and the breadth of management activities. Due to the growth of noxious weeds' impacts, the DEIS needs to disclose if and how the Integrated Vegetation Management program will control and manage noxious weed infestations due to a variety of vectors (i.e., livestock grazing, off-road vehicle activities, and road construction and maintenance) within the Planning Area. For example, studies have shown that livestock contribute to noxious weed invasion (Belsky et al., 1999; and Belsky and Gelgard, 2000) by a variety of avenues.

Accessibility and Recreation

Roads

Roads are the major source of sediment to streams and interrupt the subsurface flow of water, particularly where roads cut into steep slopes. In addition, roads and their use contribute to other environmental problems such as habitat fragmentation, wildlife disturbance, the introduction or exacerbation of noxious weeds, and increased fire danger from recreational activities. Please describe the road and culvert situation in the project area in terms of impacts on resources.

Off Road Vehicles (ORV)

Unauthorized ORV use is becoming a concern to many BLM areas since unregulated and unsanctioned ORV disturbance is inconsistent with two Executive Orders (11644 and 11989). Even the CEQ has written a report (1979) stating the environmental damage that ORV's have caused on stream reaches across numerous ecosystems throughout the United States. In general, unregulated and unsanctioned motorized vehicle use on public lands is incompatible with soil and aquatic resource management. Therefore within the Planning Area, how will the BLM prevent both short and long-term access of unauthorized motorized traffic, especially by 4-wheel drive vehicles (or ATVs), prevent unrestrained access across fragile rangelands and other sensitive areas, and effectively enforce access to restricted areas?

Biodiversity

A significant issue in the Pacific Northwest is decreasing biodiversity. To preserve native faunal numbers and abundance, and in recognition of the importance of viable habitat, the Affected Environment section of the DEIS should rate the current quality and potential capacity of habitat, its use by wildlife on and near the project area, and identify known wildlife corridors, migration routes, and areas of seasonal wildlife congregation. The Environmental Consequences sections should evaluate effects on wildlife from habitat removal and alteration; habitat fragmentation caused by roads, land use, and management activities; and increased human access. As a proactive

management plan, maintenance of biodiversity can minimize the need for listing species as threatened or endangered under the Endangered Species Act.

Furthermore, the importance of maintaining project area's biodiversity extends equally to native plant species. Therefore, efforts of disclosure within the DEIS should proceed at the same level of detail as for wildlife habitat. Preservation of floral biodiversity includes active and long-term preservation of the native genetic stock throughout the project area. Preservation of the number and abundance of the indigenous floristic community should extend from the herbaceous layer and shrub species to the tree species.

Prescribed Wildfires and Regional Haze Regulations

Pursuant to the Clean Air Act for the protection of public health and welfare and to preserve, protect, and enhance air quality, we recommend that the DEIS describe the Interim Air Quality Policy on Wildland and Prescribed Fires in relation to the alternatives. The DEIS needs to disclose the smoke management program to be used for this proposed project with pertinent discussion on visibility and haze management. In addition, we recommend that the project leaders work closely with the Western Regional Air Partnership.

The State of Idaho has a smoke management plan (or program) (SMP) that is applicable in Idaho. Federal agencies are required to abide by applicable State rules and as such this project should likewise comply with the provisions of the Idaho SMP. In addition, the State is developing a SIP revision addressing the requirements of the Regional Haze Rule (64 FR 35714, July 1, 1999) in a cooperative effort with the WRAP of which the National Park Service (DOI) and Department of Agriculture are members. We recommend that impacts from any prescribed fire be considered in light of potential provisions of an Enhanced Smoke Management Plan as developed by the WRAP.

Having two federal agencies (the Bureau of Land Management and the National Park Service) acting as co-managers, Craters of the Moon National Monument (CRMO) is in a unusual position nationally for both cooperating agencies to manage and preserve public resources. While the BLM will be implementing livestock grazing within the monument, the NPS will be working to preserve the nationally significant basaltic volcanism features and native vegetation communities located within the monument's unique kipuka habitats. To help preserve CRMO's significant basaltic volcanism features, the NPS created a portion of the CRMO as the Craters of the Moon Wilderness Area, designating it as a mandatory federal Class I Area according to the Clean Air Act. Furthermore, as stated within the NOI, fire and fuel management will continue within CRMO). Thus site management will be an active concern. Even when following a designed smoke management program (SMP), there is the potential for unwanted air quality impacts and these should be described. SMPs rely on the vagaries of the weather. Smoke generated from human activities, like prescribed fires, may not disperse as intended resulting in adverse impacts to nearby designated airsheds or communities. Contingencies for these situations should be considered, including a short-term air quality action level. Nonexceedance of the 24-hour particulate matter



(PM) under national air quality standards does not preclude the need to plan ahead given the potential adverse health impacts to individuals exposed to PM at high concentrations for shorter time periods.

Direct, Indirect, and Cumulative Effects

Please include the indirect and cumulative effects of the project in your analysis. We are as concerned with cumulative effects as we are with direct impacts posed by the individual project. To examine the impact of this project in isolation from other past, present, and reasonably foreseeable future projects in the vicinity would be to ignore what is really happening to the environment in the project area. Resources that could be examined for cumulative effects with this project are water quality, air quality (see previous discussion on Prescribed Fires), mines, old unmaintained or abandoned roads, noxious weeds, biodiversity, and visual (aesthetics) resources.

Agency guidance and information is now available. The handbook, *Considering Cumulative Effects under the National Environmental Policy Act*, issued by the Council on Environmental Quality in January 1997. In summary, the guidance states that in order to address cumulative effects, the EIS should:

- Identify resources that are being cumulatively impacted. If there are none then you need to state this.
- Determine the appropriate geographic (natural ecological boundaries) area and the time period over which the effects will occur
- Look at all past, present, and reasonably foreseeable future actions that contribute to cumulative effects on the resource of concern.
- Describe a benchmark or baseline.
- Include scientifically defensible threshold levels.

Related Regional Planning Actions

We recommend that the DEIS disclose and coordinate with other agency planning efforts that are proposing federal actions within the project area of the recently expanded CRMO. For example, the Natural Resources Conservation Service is currently proposing a project in Blaine County through the issuance of a Notice of Intent for the Little Wood River Irrigation District, Gravity Pressurized Irrigation Delivery System. Of interest, the Irrigation District is proposing returning water to the Little Wood River which could alter seasonal flows within the system. Then at a larger scale, BLM has issued an intent to prepare a Fire, Fuels, and Vegetation Management Plan within the Upper Snake River District of Idaho that includes the lands comprising CRMO.

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Monitoring

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The DEIS should establish environmental monitoring protocols that are appropriate and essential, and these same protocols should actively incorporate adaptive management principles. For example, the DEIS should identify additional mechanisms to enforce performance standards based on monitoring data when adverse impacts to rangelands from overstocking results in poor forage quality and ecological damage to fish and wildlife habitat, riparian areas, and fragile upland soils.

Regarding Tribal Consultation and Coordination

The DEIS should include ethnographic research and discuss any inter-governmental coordination on proposed activities within and adjacent to the proposed project area related to rights or historical utilization by the affected Tribe. The project co-leaders should work with the Tribe in a government-to-government relationship whereby the Tribe can work with BLM/NPS as co-managers of the natural resources. Below, we highlight specific concerns.

- 1) The DEIS should disclose how the lead federal agencies consulted and coordinated with the Tribe in development of the EIS as required by the Executive Order 13175.

Paraphrasing EPA Region 10's Tribal Consultation Process, "Consultation" means the process of seeking, discussing, and considering the views of federally recognized tribal governments at the earliest time in the decision-making process. Consultation generally means more than simply providing information about what the agency is planning to do and allowing comment. Rather, consultation means two-way communication that works toward a consensus reflecting the concerns of the affected federally recognized tribe(s).

- 2) The DEIS should disclose whether the Tribe considers lands within the project area to be "sacred sites" and provide a prescriptive accommodation plan to resolve concerns, yet not publically disclose actual site locations.

According to Executive Order 13007, federal land managers are to "accommodate access to and ceremonial use of Indian sacred sites." The SDEIS has not disclosed if the MNF has consulted with the Burns Paiute Tribe on this issue.

